

**Torres, Francine**

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**From:** family@strausmilk.com%inter2 [family@strausmilk.com] on behalf of family@strausmilk.com  
**Sent:** Tuesday, August 16, 2005 11:39 AM  
**To:** National List  
**Cc:** family@strausmilk.com%inter2  
**Subject:** AMS Docket #TM-04-07 concerning 7 CFR Part 205  
**Attachments:** ATTACHMENT.TXT

August 16, 2005

Arthur Neal, Director, Program Administration  
 National Organic Program  
 USDA-AMS-TMP-NOP  
 1400 Independence Ave., SW., Room 4008  
 So. Ag Stop 0268  
 Washington, DC 20250

Via E-mail: National.List@usda.gov

Dear Mr. Neal,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

Straus Family Creamery thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material(s):

**Lecithin (unbleached)**, as found in National List Section § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." This substance is used as an emulsifier in the production of organic chocolate chips.

Straus Family Creamery currently uses organic chocolate chips in our production of organic Mint Chocolate Chip Ice Cream. Though we always choose organic over non-organic ingredients, we have been unable to source organic chocolate chips that use an organic lecithin. We have been told that lecithin is needed to make chocolate chips and that so far the organic lecithin being made does not work properly in making the chips.

Organic chocolate chips (made with non-GMO lecithin (unbleached)) are a key ingredient in our formulation without which we would be unable to produce our organic Mint Chocolate Chip Ice Cream.

We have been unable to find an organic chocolate chip that contains organic lecithin. Until it is available, we feel that lecithin (unbleached) be kept on the National List Section § 205.606.

Sincerely,

*Vivien Straus*  
 Straus Family Creamery

8/17/2005